

Remarks

Claim 12 relates to a system mountable in a motor vehicle effective in preventing manipulation of a memory module functional in operating a control device of a component of said vehicle. The system comprises means for reading an identifier stored in a first memory module functional in operating said control device and means for storing said identifier in a read only memory of said system. The second paragraph on page 6 of the specification (paragraph [0027] of the published application US 2006/0100749 A1) states,

In the process of manufacturing the control device as claimed in the invention, when the control device is started up for the first time the IDs of the individual memory modules 2, 3 are **read out by the microcomputer  $\mu$ C and stored in the OTP area 11 of the  $\mu$ C, which area is writable only once.** Starting from this time, operation of the control device 1 is only possible in conjunction with the IDs of the external memory modules 2, 3, which IDs are known to the  $\mu$ C.

Therefore, the specification describes a microcomputer as one means for reading an identifier stored in a first memory module functional in operating said control device and as one means for storing said identifier in a read only memory of said system.

The system also comprises means for reading an identifier stored in a second memory module intended to replace an installed memory module, functional in operating said control device. The third paragraph on page 6 of the specification (paragraph [0027] of the published application US 2006/0100749 A1) states,

With each additional start-up of the control device 1, **the  $\mu$ C again reads out the ID of all of the memory modules 2, 3 connected to it.**

Therefore, the specification describes a microcomputer as one means for reading an identifier stored in a second memory module intended to replace an installed memory module, functional in operating said control device.

Finally, the system comprises means for authenticating said second memory module by comparing the identifier of said second memory module with the identifier stored in said read only memory. The third paragraph on page 6 of the specification (paragraph [0027] of the published application US 2006/0100749 A1) states,

In a **comparison unit** these current IDs may then be compared to the original identifiers which are stored in the OTP area 11 of the  $\mu$ C. If it is established in this comparison that one of the IDs does not agree with one of the original IDs, the control device is prevented from operating or at least the change is diagnosed and optionally displayed.

Similarly, the sixth paragraph on page 5 of the specification (paragraph [0024] of the published application US 2006/0100749 A1) states,

Furthermore, **an authentication unit** 12 is contained in the  $\mu$ C. It may constitute an electronic circuit or a program in the  $\mu$ C.

Therefore, the specification describes a comparison unit, an authentication unit, an electronic circuit or a program in the microcomputer as a means for authenticating said second memory module by comparing the identifier of said second memory module with the identifier stored in said read only memory.

The amendment to claim 19 finds support throughout the specification, for example in the second paragraph on page 6 of the specification (paragraph [0027] of the published application US 2006/0100749 A1). New claim 20 finds support throughout the specification, for example in the second and third paragraphs on page 6 of the specification (paragraphs [0027] and [0028] of the published application US 2006/0100749 A1) and the sixth paragraph on page 5 of the specification (paragraph [0024] of the published application US 2006/0100749 A1).

US 5,763,958 to Yamamoto et al. (hereinafter, "Yamamoto") does not describe means for storing said identifier in a read only memory of a system mountable in a motor vehicle effective in preventing manipulation of a memory module functional in operating a control device of a component of said vehicle.

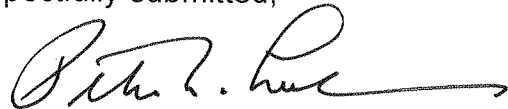
The Office action incorrectly cites column 8, lines 22 – 31 of Yamamoto as disclosing means for storing said identifier in a read only memory of said system. This portion of Yamamoto states, an ID code recorded in the EEPROM 34 is recorded in the RAM 30. Yamamoto does not describe any means for storing said identifier in a read only memory of said system. None of the other references are cited to compensate for this shortcoming. Favorable reconsideration is respectfully requested.

The Director is hereby authorized to charge any deficiency in fees filed, asserted to be filed, or which should have been filed herewith (or with any paper hereafter filed in this application by this firm) to our Deposit Account 14-1437. Please credit any excess fees to such account.

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